

BEFORE THE DIVISION OF MEDICAL QUALITY
BOARD OF MEDICAL QUALITY ASSURANCE
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA

In the Matter of the Accusation)
Against:)

JOHN WITTER BRADSHAW, M.D.)
License No. G-26168)

Respondent.)
_____)

NO. D-3352


DECISION

The attached Stipulation is hereby adopted by the
Division of Medical Quality of the Board of Medical Quality
Assurance as its Decision in the above-entitled matter.

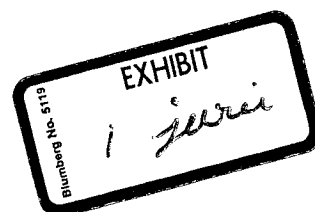
This Decision shall become effective on October 3,
1986

IT IS SO ORDERED September 3, 1986

DIVISION OF MEDICAL QUALITY
BOARD OF MEDICAL QUALITY ASSURANCE



EUGENE J. ELLIS, M.D.
President



1 JOHN K. VAN DE KAMP, Attorney General
of the State of California
2 CONSTANCE M. BARTON
Deputy Attorney General
3 1515 K Street, Suite 511
Sacramento, California 95814
4 Telephone: (916) 324-5363

5 Attorneys for Complainant
6
7

8 BEFORE THE
DIVISION OF MEDICAL QUALITY
9 BOARD OF MEDICAL QUALITY ASSURANCE
DEPARTMENT OF CONSUMER AFFAIRS
10 STATE OF CALIFORNIA

11 In the Matter of the Accusation) No. D-3352
12 Against:)
13 JOHN WITTER BRADSHAW, M.D.) STIPULATION, DECISION
249 N. Villa) AND ORDER
14 Willows, CA 95988)
Physician's and Surgeon's)
15 Certificate No. G-26168)
16 Respondent.)

17
18 It is hereby stipulated by the parties to the above-
19 entitled matter as follows:

20 1. Accusation No. D-3352 has been filed and served upon
21 John Witter Bradshaw, M.D. (hereinafter "Respondent") by certi-
22 fied mail and Respondent filed a timely Notice of Defense
23 requesting a hearing on the charges. Said accusation is attached
24 hereto and incorporated herein by reference as though fully set
25 forth.

26 2. Respondent has fully discussed with his counsel the
27 charges and allegations of violations alleged in the accusation

1 and has been fully advised of his rights under the Administrative
2 Procedure Act, including his right to a formal hearing and an
3 opportunity to defend against charges contained therein,
4 reconsideration, and appeal from any adverse decision which might
5 be rendered following the hearing. Respondent knowingly and
6 intelligently waives all of said rights.

7 3. Respondent admits the allegations contained in
8 Accusation No. D-3352 and that cause exists thereby to impose
9 discipline upon his physician's and surgeon's certificate, as set
10 forth in Accusation No. D-3352. In addition, respondent admits
11 that he is also subject to discipline for unprofessional conduct
12 within the meaning of Business and Professions Code section
13 2234(b), (c) and (d) for gross negligence, repeated negligent
14 acts and incompetence in the handling of certain obstetrical
15 cases during a period from approximately October 1983 to July
16 1984.

17 4. The foregoing admission is made for the purpose of
18 this stipulation only, and in the event this stipulation is not
19 adopted by the Board of Medical Quality Assurance, the admission
20 made herein shall be null, void and inadmissible in any
21 proceedings involving the parties to it.

22 WHEREFORE, it is stipulated that the Board of Medical
23 Quality Assurance may issue the following order:

24 1. Physician's and Surgeon's Certificate No. G-26168
25 issued to Respondent John Witter Bradshaw, M.D., is hereby
26 revoked; however, execution of said order of revocation shall be

27 / / / /

1 stayed and Respondent is placed on probation for seven years upon
2 the following terms and conditions:

3 a. During probation, respondent is prohibited from
4 practicing obstetrics.

5 b. Respondent shall not prescribe, administer,
6 dispense, order, or possess any controlled substances as defined
7 by the California Uniform Controlled Substances Act, except for
8 those drugs listed in Schedules IV and V of the Act.

9 Respondent shall immediately surrender Respondent's
10 current DEA permit to the Drug Enforcement Administration for
11 cancellation and reapply for a new DEA permit limited to those
12 Schedules authorized by this order.

13 c. Respondent shall maintain a record of all
14 controlled substances prescribed, dispensed or administered by
15 Respondent during probation, showing all the following: (1) the
16 name and address of the patient, (2) the date, (3) the character
17 and quantity of controlled substances involved, and (4) the
18 pathology and purpose for which the controlled substance was
19 furnished.

20 Respondent shall keep these records in a separate
21 file or ledger, in chronological order, and shall make them
22 available for inspection and copying by the Division or its
23 designee, upon request.

24 d. Within 90 days of the effective date of this
25 decision, and on an annual basis thereafter, Respondent shall
26 submit to the Division for its prior approval an educational
27 program or courses related to family practice and medical

1 therapeutics, which shall not be less than 40
2 hours per year, for each year of probation. This program shall
3 be in addition to the Continuing Medical Education requirements
4 for re-licensure. Following the completion of each course, the
5 Division or its designee may administer an examination to test
6 Respondent's knowledge of the course. Respondent shall submit
7 proof of attendance for 65 hours of continuing medical education,
8
9

10 e. Within 30 days of the effective date of this
11 decision, Respondent shall take and pass an oral clinical
12 examination to be administered by the Division or its designee,
13 which will include the subjects of family practice and medical
14 therapeutics. If Respondent fails this examination, Respondent
15 must wait three months between reexaminations, except that after
16 three failures Respondent must wait one year to take each
17 necessary reexamination thereafter. The Division shall pay the
18 cost of the first examination and Respondent shall pay the costs
19 of any subsequent examinations.

20 If Respondent fails to take and pass this
21 examination within 30 days of the effective date of this
22 decision, then the stay of this decision shall be terminated and
23 Respondent shall cease the practice of medicine until this
24 examination has been successfully passed and Respondent has been
25 so notified by the Division in writing.

26 / / / /

27 / / / /

1 f. Respondent shall obey all federal, state and
2 local laws, and all rules governing the practice of medicine in
3 California.

4 g. Respondent shall submit quarterly declarations
5 under penalty of perjury on forms provided by the Division,
6 stating whether there has been compliance with all the conditions
7 of probation.

8 h. Respondent shall comply with the Division's
9 probation surveillance program.

10 i. Respondent shall appear in person for inter-
11 views with the Division's medical consultant upon request at
12 various intervals and with reasonable notice.

13 j. In the event Respondent should leave California
14 to reside or practice outside the state, Respondent must notify
15 in writing the Division of the dates of departure and return.
16 Periods of residency or practice outside California will not
17 apply to the reduction of this probationary period.

18 k. Upon successful completion of probation,
19 Respondent's certificate will be fully restored.

20 l. If Respondent violates probation in any
21 respect, the Division, after giving Respondent notice and the
22 opportunity to be heard, may revoke probation and carry out the
23 disciplinary order that was stayed. If an accusation or petition
24 to revoke probation is filed against Respondent during probation,
25 the Division shall have continuing jurisdiction until the matter


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1 is final, and the period of probation shall be extended until the
2 matter is final.

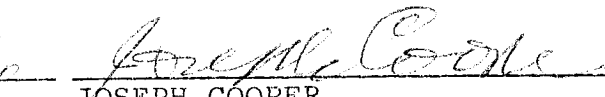
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4 DATED:

4-30-86


JOHN WITTER BRADSHAW, M.D.
Respondent

5
6
7 DATED:

4-30-86


JOSEPH COOPER
Attorney for Respondent

8
9
10 DATED:

5-1-86

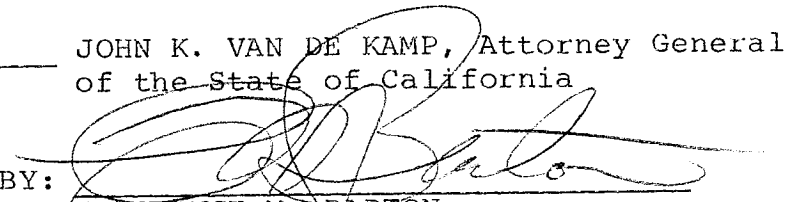
JOHN K. VAN DE KAMP, Attorney General
of the State of California

BY: CONSTANCE M. BARTON
Deputy Attorney General

EXHIBIT A

1 JOHN K. VAN DE KAMP, Attorney General
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DEPARTMENT OF CONSUMER AFFAIRS
9 STATE OF CALIFORNIA

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11 In the Matter of the Accusation) No. D-3352
Against:)
12)
JOHN WITTER BRADSHAW, M.D.)
13 249 N. Villa) ACCUSATION
Willows, California 95988)
14)
Physician's and Surgeon's)
15 Certificate No. G-26168)
16 Respondent.)
_____)

17
18 Complainant, Kenneth Wagstaff, alleges:

19 I.

20 He is the Executive Director of the Board of Medical
21 Quality Assurance of the State of California (hereinafter referred
22 to as the "Board") and makes and files this Accusation in his
23 official capacity and not otherwise.

24 II.

25 On or about December 11, 1973, John Witter Bradshaw,
26 M.D., (hereinafter referred to as "respondent") was issued
27 Physician's and Surgeon's Certificate No. G-26168 by the Board and

1 at all times herein mentioned, respondent was, and now is, licensed
2 to practice medicine and surgery in the State of California.

3 III.

4 Under sections 2220 and 2227 of the Business and
5 Professions Code (hereinafter referred to as the "Code"), the
6 Division of Medical Quality may take action against all persons
7 guilty of violating the Medical Practices Act, and may suspend
8 or revoke any certificate issued.

9 IV.

10 Section 2234 of the Code provides, in pertinent part,
11 that the Division of Medical Quality shall take action against any
12 licensee who is charged with unprofessional conduct, including,
13 but not limited to, "(b) Gross negligence; (c) Repeated negligent
14 acts; (d) Incompetence."

15 V.

16 Section 2238 of the Code provides that a violation of
17 any federal statute or regulation or any of the statutes or
18 regulations of this state regulating narcotics, dangerous drugs,
19 or controlled substances constitutes unprofessional conduct.

20 VI.

21 Section 2241 of the Code provides, in part, that the
22 prescribing of controlled drugs or dangerous drugs to an addict or
23 habitue' constitutes unprofessional conduct.

24 VII.

25 Section 2242(a) provides that prescribing, dispensing,
26 or furnishing dangerous drugs as defined in section 4211 without

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1 a good faith prior examination and medical indication therefor
2 constitutes unprofessional conduct.

3 VIII.

4 Section 725 of the Code provides, in part, that repeated
5 acts of clearly excessive prescribing or administering of drugs or
6 treatment as determined by the standard of the local community of
7 licensees is unprofessional conduct for a physician and surgeon.

8 IX.

9 Section 11190 of the Health and Safety Code provides
10 that:

11 "Every practitioner, other than a pharmacist,
12 who issues a prescription, or dispenses or administers
13 a controlled substance classified in Schedule II
14 shall make a record that, as to the transaction,
15 shows all of the following:

16 "(a) The name and address of the patient.

17 "(b) The date.

18 "(c) The character and quantity of controlled
19 substances involved.

20 "The prescriber's record shall show the pathology
21 and purpose for which the prescription is issued, or
22 the controlled substance administered, prescribed,
23 or dispensed."

24 X.

25 "Dilaudid", also known as "Hydromorphone", is a
26 Schedule II controlled substance as designated by Section 11055
27 (b) (1) (K) of the Health and Safety Code.

1 "Demerol", also known as "Isonipeccaine", "Pethidine" or
2 "Meperidine Hydrochloride" is a Schedule II controlled substance
3 as designated by Section 11055(c)(15) of the Health and Safety
4 Code.

5 "Dexedrine", also known as "dextroamphetamine sulfate",
6 is a Schedule II controlled substance as designated by Section
7 11055(d)(1) of the Health and Safety Code.

8 Dilaudid and Demerol are "narcotic drugs" as provided
9 by Sections 11019 and 11032 of the Health and Safety Code.

10 Dilaudid, Demerol and Dexedrine are dangerous drugs pursuant to
11 Section 4211(a) of the Business and Professions Code.

12 XI.

13 Patient J.F.

14 Respondent is subject to discipline pursuant to
15 Section 2234 of the Code in that he is guilty of unprofessional
16 conduct within the meaning of sections 725, 2234(b), (c) and (d),
17 2241 and 2242(a) and 2238, within the meaning of Health and
18 Safety Code section 11190, as more particularly alleged herein-
19 after:

20 A. On or about the dates set forth below, respondent
21 prescribed Dexedrine, 5.0 mgs. for patient J.F., in the quantities
22 as indicated:

| <u>Date of Dexedrine Rx</u> | <u>Amount of 5.0 mgs. prescribed</u> |
|-----------------------------|--|
| 8/8/78 | 60 |
| 10/3/78 | 100 |
| 1/29/79 | 100 |
| 4/24/79 | 100 |

| | <u>Date of Dexedrine Rx</u> (cont'd.) | <u>Amount of 5.0 mgs. prescribed</u> (cont'd.) |
|----|---|--|
| 1 | | |
| 2 | | |
| 3 | 8/21/79 | 100 |
| 4 | 10/11/79 | 100 |
| 5 | 12/11/79 | 100 |
| 6 | 2/18/80 | 100 |
| 7 | 4/10/80 | 100 |
| 8 | 6/24/80 | 100 |
| 9 | 8/29/80 | 100 |
| 10 | 10/16/80 | 100 |
| 11 | 11/25/80 | 100 |
| 12 | 2/3/81 | 100 |
| 13 | 3/20/81 | 100 |
| 14 | 5/8/81 | 100 |
| 15 | 7/15/81 | 100 |
| 16 | 9/28/81 | 100 |
| 17 | 1/4/82 | 100 |
| 18 | 3/29/82 | 100 |
| 19 | 6/2/82 | 100 |
| 20 | 8/20/82 | 100 |
| 21 | 11/1/82 | 100 |
| 22 | 1/4/83 | 100 |
| 23 | 2/25/83 | 100 |
| 24 | 4/4/83 | 100 |
| 25 | 4/22/83 | 100 |
| 26 | 6/7/83 | 100 |
| 27 | 8/2/83 | 100 |

| | <u>Date of Dexedrine Rx (cont'd.)</u> | <u>Amount of 5.0 mgs. prescribed (cont'd.)</u> |
|---|---|--|
| 1 | | |
| 2 | | |
| 3 | 9/30/83 | 100 - |
| 4 | 3/2/84 | 100 |
| 5 | 5/11/84 | 100 |

6 B. Respondent violated Section 2242(a) in that, in
7 numerous instances as described in Paragraph XI.A., he prescribed
8 Dexedrine, a Schedule II dangerous drug, for patient J.F. without
9 a good faith prior examination and medical indication therefor.

10 C. Respondent violated Section 725 of the Code in that
11 the prescribing of Dexedrine for J.F. as set forth in Paragraph
12 XI.A. constitutes repeated acts of clearly excessive prescribing
13 as determined by the standard of the local community of licensees.

14 D. Respondent violated Section 2238 of the Code in that
15 he failed to make or maintain records of all the Schedule II
16 prescriptions for Dexedrine set forth in Paragraph XI.A., as
17 required by Section 11190 of the Health and Safety Code.

18 E. Respondent violated Section 2241 in that he con-
19 tinued to prescribe Dexedrine, a Schedule II controlled substance
20 and dangerous drug, for J.F., when respondent knew or should have
21 known that said patient was an addict or habitue.

22 F. Respondent is guilty of gross negligence in the
23 treatment of J.F. in violation of Section 2234(b) in that despite
24 repeated indications that J.F. was a drug abuser, respondent
25 repeatedly prescribed Dexedrine, a Schedule II controlled drug,
26 for J.F. without any examination and medical indication, and

27 ///

1 failed to make any follow-up as to the side effects of the
2 substance on the patient.

3 G. Respondent is guilty of repeated negligent acts in
4 violation of Section 2234(c) in that the acts or omissions
5 described above in Paragraphs XI.A-F were repeated numerous times
6 over a period of six years as described in Paragraph XI.A. above.

7 H. Respondent further violated Section 2242(a) in that
8 on 3/3/78, 1/29/79, 4/23/79, 5/22/79, 8/21/79, 12/11/79, 6/24/80,
9 12/11/80, 5/8/81, 1/4/82, 6/2/82, 2/24/84, and 3/30/84,
10 respondent injected Vitamin B-12 into J.F. at times when there
11 was no good faith examination and medical indication for such
12 drug.

13 I. Respondent violated Section 2234(c) in that the
14 repeated injection of Vitamin B-12 on the numerous occasions as
15 described in Paragraph H above without any documentation for its
16 need, examination or indication constitutes repeated negligent
17 acts.

18 J. Respondent violated Section 2234(d) in that the
19 injection of Vitamin B-12 as described in Paragraph H above with-
20 out any medical indication constitutes incompetence.

21 XII.

22 Patient E.F.

23 Respondent is subject to discipline pursuant to
24 Section 2234 of the Code in that he is guilty of unprofessional
25 conduct within the meaning of Sections 2234(b) and (c), 2242(a),
26 and 2238 within the meaning of Health and Safety Code Section
27 11190, as more particularly alleged hereinafter:

1 A. On or about the dates set forth below, respondent
2 prescribed Dilaudid, 4.0 mgs. for patient E.F., in the quantities
3 as indicated:

4 ///
5 ///
6 ///
7 ///
8 ///
9 ///
10 ///
11 ///
12 ///
13 ///
14 ///
15 ///
16 ///
17 ///
18 ///
19 ///
20 ///
21 ///
22 ///
23 ///
24 ///
25 ///
26 ///
27 ///

7.a.

| | <u>Date of Dilaudid Rx</u> | <u>Amount of 4.0 mgs. prescribed</u> |
|----|--------------------------------|--|
| 1 | | |
| 2 | | |
| 3 | 4/1/82 | 50 |
| 4 | 5/29/82 | 50 |
| 5 | 8/13/82 | 50 |
| 6 | 11/26/82 | 50 |
| 7 | 3/15/83 | 50 |
| 8 | 7/1/83 (6/30/83) | 50 |
| 9 | 10/12/83 | 50 |
| 10 | 12/13/83 | 50 |
| 11 | 1/25/84 | 50 |

12 B. Respondent violated Section 2242(a) in that at num-
 13 erous instances as described in Paragraph XII.A., he prescribed
 14 Dilaudid, a Schedule II dangerous drug, for Patient E.F., without
 15 a good faith prior examination and medical indication therefor.

16 C. Respondent violated Section 2238 of the Code in
 17 that he failed to make or maintain records as required by
 18 Section 11190 of the Health and Safety Code, of the Schedule II
 19 prescriptions for Dilaudid written for patient E.F. on 5/29/82 and
 20 10/12/83, as set forth above in Paragraph XII.A.

21 D. Respondent is guilty of gross negligence in the
 22 treatment of E.F. in violation of Section 2234(b) in that on at
 23 least nine separate occasions as described in Paragraph XII.A.
 24 above, respondent repeatedly prescribed Dilaudid, a Schedule II
 25 controlled drug, for E.F. without any physical examination and
 26 medical indication, and failed to make any attempt to treat the
 27 patient with alternative non-addictive substances.

1 E. Respondent is guilty of repeated negligent acts in
2 violation of Section 2234(c) in that the acts or omissions
3 described above in Paragraphs XII.A-D were repeated numerous times
4 over a period of twenty-one months as described in Paragraph
5 XII.A. above.

6 XIII.

7 Patient R.W.

8 Respondent is subject to discipline pursuant to Section
9 2234 of the Code in that he is guilty of unprofessional conduct
10 within the meaning of Sections 725, 2234(b) and (c), 2241 and 2242
11 (a), and 2238 within the meaning of Health and Safety Code Section
12 11190, as more particularly alleged hereinafter:

13 A. On or about the dates set forth below, respondent
14 prescribed Dilaudid, 4.0 mgs., for patient R.W., in the quantities
15 as indicated:

| 16 | <u>Date of</u> | <u>Amount of 4.0 mgs.</u> |
|----|--------------------|---------------------------|
| 17 | <u>Dilaudid Rx</u> | <u>prescribed</u> |
| 18 | 8/26/83 | 90 |
| 19 | 9/26/83 | 90 |
| 20 | 10/28/83 | 90 |
| 21 | 1/19/84 | 90 |
| 22 | 2/19/84 | 90 |
| 23 | 3/12/84 | 90 |
| 24 | 4/5/84 | 90 |
| 25 | 5/4/84 | 90 |
| 26 | 5/29/84 | 90 |
| 27 | 7/2/84 | 90 |

1 B. Respondent violated Section 2242(a) in that in
2 numerous instances as described in Paragraph XIII.A., he prescribed
3 Dilaudid, a Schedule II dangerous drug for Patient R.W. without a
4 good faith prior examination and medical indication therefor.

5 C. Respondent violated Section 725 of the Code in that
6 the prescribing of Dilaudid for R.W. as set forth in Paragraph
7 XIII.A. constitutes repeated acts of clearly excessive prescribing
8 as determined by the standard of the local community of licensees.

9 D. Respondent violated Section 2238 of the Code in
10 that he failed to make or maintain records as required by
11 Section 11190 of the Health and Safety Code, of the Schedule II
12 prescriptions for Dilaudid written for patient R.W. on 8/26/83,
13 9/26/83, 5/4/84, 5/29/84, and 7/2/84, as set forth above in
14 Paragraph XIII.A.

15 E. Respondent violated Section 2241 in that he con-
16 tinued to prescribe Dilaudid, a Schedule II controlled substance
17 and dangerous drug, for R.W. when respondent knew or should have
18 known that said patient was an addict or habitue.

19 F. Respondent is guilty of gross negligence in the
20 treatment of R.W. in violation of Section 2234(b) in that despite
21 repeated indications that R.W. was a drug abuser, respondent
22 repeatedly prescribed excessive amounts of Dilaudid, a Schedule II
23 controlled drug, for R.W. without any examination, medical
24 indication, documentation for the need for the drugs, and failed
25 to make any attempt to treat the patient with alternative non-
26 addictive substances.

27 ///

1 G. Respondent is guilty of repeated negligent acts in
2 violation of Section 2234(c) in that the acts or omissions
3 described above in Paragraphs XIII.A-F were repeated numerous times
4 over a period of twelve months as described in Paragraph XIII.A.
5 above.

6 XIV.

7 Patient M.H.

8 Respondent is subject to discipline pursuant to Section
9 2234 of the Code in that he is guilty of unprofessional conduct
10 within the meaning of Sections 2234(b) and (c), 2241 and 2242(a),
11 as more particularly alleged hereinafter:

12 A. On or about the dates set forth below, respondent
13 prescribed Dilaudid, 4.0 mgs., for patient M.H., in the quantities
14 as indicated:

| 15 | Date of Dilaudid Rx | Amount of 4.0 mgs. <u>prescribed</u> |
|----|------------------------|---|
| 16 | 6/10/83 | 30 |
| 17 | 7/18/83 | 30 |
| 18 | 9/7/83 | 30 |
| 19 | 10/10/83 | 30 |
| 20 | 11/7/83 | 30 |
| 21 | 12/7/83 | 30 |
| 22 | 1/5/84 | 30 |
| 23 | 2/3/84 | 30 |
| 24 | 2/27/84 | 50 |
| 25 | | |

26 B. Respondent violated Section 2242(a) in that in
27 numerous instances as described in Paragraph XIV.A., he prescribed

1 Dilaudid, a Schedule II dangerous drug, for Patient M.H. without
2 a good faith prior examination and medical indication therefor.

3 C. Respondent violated Section 2241 by continuing to
4 prescribe Dilaudid, a Schedule II controlled substance and
5 dangerous drug, for M.H. when respondent knew or should have known
6 that said patient was an addict or habitue.

7 D. Respondent is guilty of gross negligence in the
8 treatment of M.H. in violation of Section 2234(b) in that despite
9 repeated indications that M.H. was a drug abuser, respondent
10 repeatedly prescribed Dilaudid, a Schedule II controlled drug,
11 for M.H. without any examination, medical indication or documen-
12 tation of the need for the drugs, and failed to make any attempt
13 to treat the patient with alternative non-addictive substances.

14 E. Respondent is guilty of repeated negligent acts in
15 violation of Section 2234(c) in that the acts or omissions
16 described in Paragraphs XIV.A-D were repeated numerous times over
17 a period of nine months as described in Paragraph XIV.A. above.

18 XV.

19 Patient D.I.

20 Respondent is subject to discipline pursuant to Section
21 2234 of the Code in that he is guilty of unprofessional conduct
22 within the meaning of Sections 725, 2234(b) and (c), 2241 and
23 2242(a) and 2238 within the meaning of Health and Safety Code
24 Section 11190, as more particularly alleged hereinafter:

25 A. On or about the dates set forth below, respondent
26 prescribed, administered, furnished and/or dispensed Demerol for
27 patient D.I., in the manner and quantities as indicated:

| | <u>Date</u> | <u>Manner Provided</u> | <u>Amount of Demerol</u> |
|----|-------------|----------------------------|------------------------------|
| 1 | | | |
| 2 | | | |
| 3 | 8/24/76 | Injection | 75 mgs. |
| 4 | 12/20/76 | Injection | 100 mgs. |
| 5 | 1/28/77 | Injection | 100 mgs. |
| 6 | 2/9/77 | Injection | 100 mgs. |
| 7 | 3/3/77 | Injection | 100 mgs. |
| 8 | 3/31/77 | Injection | 100 mgs. |
| 9 | 4/7/77 | Injection | 100 mgs. |
| 10 | 5/9/77 | Injection | 100 mgs. |
| 11 | 5/19/77 | Injection | 100 mgs. |
| 12 | 7/19/77 | Injection | 100 mgs. |
| 13 | 7/29/77 | Injection | 100 mgs. |
| 14 | 8/12/77 | Injection | 100 mgs. |
| 15 | 8/12/77 | Prescribed | 50 mg. tabs #20 |
| 16 | 9/6/77 | Injection | 100 mgs. |
| 17 | 10/3/77 | Injection | 100 mgs. |
| 18 | 11/28/77 | Injection | 100 mgs. |
| 19 | 1/16/78 | Injection | 100 mgs. |
| 20 | 1/19/78 | Injection | 100 mgs. |
| 21 | 2/1/78 | Furnished | 10 ml. |
| 22 | 2/6/78 | Injection | 100 mgs. |
| 23 | 3/3/78 | Injection | 100 mgs. |
| 24 | 3/3/78 | Furnished | 10 cc. & 7 syringes |
| 25 | 4/3/78 | Furnished | 10 ml. & 7 syringes |
| 26 | 4/3/78 | Furnished | 100 mg. tabs #12 |
| 27 | 5/2/78 | Furnished | 10 cc. & syringes |
| | | 13. | |

| | <u>Date</u> | <u>Manner Provided</u> | <u>Amount of Demerol</u> |
|----|-------------|----------------------------|------------------------------|
| 1 | | | |
| 2 | | | |
| 3 | 5/2/78 | Injection | 2 cc. |
| 4 | 5/15/78 | Furnished | 10 cc. & 7 syringes |
| 5 | 5/15/78 | Injection | 100 mgs. |
| 6 | 6/12/78 | Furnished | 10 cc. & 7 syringes |
| 7 | 6/30/78 | Furnished | 10 cc. & 7 syringes |
| 8 | 6/30/78 | Injection | 100 mgs. at 1:45pm |
| 9 | 6/30/78 | Injection | 100 mgs. at 6:10pm |
| 10 | 7/14/78 | Injection | 100 mgs. (2cc) |
| 11 | 7/26/78 | Injection | 100 mgs. (2cc) |
| 12 | 7/26/78 | Furnished | 12 cc. & 8 syringes |
| 13 | 8/29/78 | Furnished | "Refill on medications" |
| 14 | 8/31/78 | Injection | 100 mgs. |
| 15 | 9/18/78 | Injection | 100 mgs. |
| 16 | 9/18/78 | Furnished | 12 cc. & 7 syringes |
| 17 | 10/3/78 | Furnished | 12 cc. & 7 syringes |
| 18 | 10/20/78 | Injection | 100 mgs. |
| 19 | 10/20/78 | Furnished | 12 cc. & 7 syringes |
| 20 | 11/10/78 | Furnished | 12 cc. & 7 syringes |
| 21 | 12/8/78 | Furnished | 12 cc. & 7 syringes |
| 22 | 12/28/78 | Injection | 100 mgs. |
| 23 | 12/28/78 | Furnished | 12 cc. & 7 syringes |
| 24 | 1/15/79 | Furnished | 12 cc. & 7 syringes |
| 25 | 2/12/79 | Injection | 100 mgs. |
| 26 | 2/12/79 | Furnished | 12 cc. |
| 27 | 3/9/79 | Injection | 100 mgs. |
| | | 14. | |

| | <u>Date</u> | <u>Manner Provided</u> | <u>Amount of Demerol</u> |
|----|-------------|----------------------------|----------------------------------|
| 1 | | | |
| 2 | | | |
| 3 | 3/9/79 | Furnished | 12 cc. |
| 4 | 4/5/79 | Injection | 75 mgs. |
| 5 | 4/5/79 | Furnished | 12 cc. |
| 6 | 5/3/79 | Furnished | 12 cc. & 7 syringes |
| 7 | 5/31/79 | Furnished | 12 cc. |
| 8 | 5/31/79 | Injection | 2 cc. |
| 9 | 6/21/79 | Injection | 2 cc. |
| 10 | 6/21/79 | Furnished | 12 cc. & 7 syringes |
| 11 | 7/26/79 | Injection | 2 cc. |
| 12 | 7/26/79 | Furnished | 12 cc. & 7 syringes |
| 13 | 8/21/79 | Injection | 2 cc. |
| 14 | 8/21/79 | Furnished | 12 cc. & 7 syringes |
| 15 | 9/14/79 | Injection | 100 mgs. |
| 16 | 9/14/79 | Furnished | 10 cc. Phenergan & 7 syringes |
| 17 | 9/14/79 | Prescribed | 100 mgs. tabs #25 |
| 18 | 10/9/79 | Injection | 100 mgs. |
| 19 | 10/10/79 | Injection | 100 mgs. |
| 20 | 10/26/79 | Injection | 100 mgs. |
| 21 | 11/7/79 | Injection | 100 mgs. |
| 22 | 11/7/79 | Prescribed | 100 mgs. tabs #25 |
| 23 | 12/4/79 | Injection | 100 mgs. |
| 24 | 1/4/80 | Prescribed | 100 mgs. tabs #25 |
| 25 | 1/4/80 | Furnished | Demerol & 2 syringes |
| 26 | 1/8/80 | Injection | 100 mgs. |
| 27 | 1/31/80 | Injection | 100 mgs. |

15.

| | <u>Date</u> | <u>Manner Provided</u> | <u>Amount of Demerol</u> |
|----|-------------|----------------------------|------------------------------|
| 1 | | | |
| 2 | | | |
| 3 | 2/28/80 | Injection | 100- mgs. |
| 4 | 2/28/80 | Prescribed | 100 mg. tabs #25 |
| 5 | 3/24/80 | Prescribed | 100 mg. tabs #25 |
| 6 | 3/24/80 | Injection | 100 mgs. |
| 7 | 4/12/80 | Injection | 100 mgs. |
| 8 | 4/15/80 | Injection | 100 mgs. |
| 9 | 4/21/80 | Injection | 100 mgs. |
| 10 | 4/22/80 | Injection | 100 mgs. |
| 11 | 5/15/80 | Injection | 100 mgs. |
| 12 | 5/15/80 | Prescribed | 100 mg. tabs #25 |
| 13 | 6/9/80 | Injection | 100 mgs. |
| 14 | 6/9/80 | Prescribed | 100 mg. tabs #25 |
| 15 | 6/19/80 | Injection | 100 mgs. |
| 16 | 7/2/80 | Prescribed | 100 mg. tabs #25 |
| 17 | 7/2/80 | Injection | 100 mgs. |
| 18 | 7/30/80 | Injection | 100 mgs. |
| 19 | 7/30/80 | Prescribed | 100 mg. tabs #25 |
| 20 | 8/12/80 | Injection | 100 mgs. |
| 21 | 8/13/80 | Injection | 100 mgs. |
| 22 | 8/29/80 | Injection | 100 mgs. |
| 23 | 8/29/80 | Prescribed | 100 mg. tabs #25 |
| 24 | 9/22/80 | Injection | 100 mgs. |
| 25 | 10/9/80 | Injection | 100 mgs. |
| 26 | 10/21/80 | Injection | 100 mgs. |
| 27 | 11/10/80 | Injection | 75 mgs. |

16.

| | <u>Date</u> | <u>Manner Provided</u> | <u>Amount of Demerol</u> |
|----|-------------|----------------------------|---------------------------------|
| 1 | | | |
| 2 | | | |
| 3 | 11/17/80 | Injection | 100 mgs. |
| 4 | 12/10/80 | Prescribed | 50 mg. tabs #50 |
| 5 | 12/10/80 | Injection | 100 mgs. |
| 6 | 12/10/80 | Injection | 100 mgs. repeated in evening |
| 7 | 12/29/80 | Injection | 100 mgs. |
| 8 | 12/30/80 | Injection | 100 mgs. |
| 9 | 1/6/81 | Injection | 100 mgs. |
| 10 | 1/6/81 | Prescribed | 50 mg. tabs #50 |
| 11 | 1/15/81 | Injection | 100 mgs. |
| 12 | 2/2/81 | Prescribed | 50 mg. tabs #50 |
| 13 | 2/2/81 | Injection | 100 mgs. |
| 14 | 2/17/81 | Injection | 100 mgs. |
| 15 | 3/2/81 | Injection | 100 mgs. |
| 16 | 3/2/81 | Prescribed | 50 mg. tabs #50 |
| 17 | 4/1/81 | Injection | 100 mgs. |
| 18 | 4/1/81 | Prescribed | 50 mg. tabs #50 |
| 19 | 4/21/81 | Injection | 100 mgs. @5:30pm |
| 20 | 4/21/81 | Injection | 100 mgs. @10:00pm |
| 21 | 4/22/81 | Injection | 100 mgs. |
| 22 | 5/1/81 | Injection | 100 mgs. |
| 23 | 5/1/81 | Prescribed | 50 mg. tabs #50 |
| 24 | 6/1/81 | Prescribed | 50 mg. tabs #50 |
| 25 | 6/1/81 | Injection | 100 mgs. |
| 26 | 7/2/81 | Injection | 100 mgs. |
| 27 | 7/2/81 | Prescribed | 50 mg. tabs #50 |

17.

| | <u>Date</u> | <u>Manner Provided</u> | <u>Amount of Demerol</u> |
|----|-------------|----------------------------|------------------------------|
| 1 | | | |
| 2 | | | |
| 3 | 7/20/81 | Injection | 75 mgs. |
| 4 | 8/3/81 | Injection | 100 mgs. |
| 5 | 8/3/81 | Prescribed | 50 mg. tabs #50 |
| 6 | 9/1/81 | Injection | 100 mgs. |
| 7 | 9/1/81 | Prescribed | 50 mg. tabs #50 |
| 8 | 9/21/81 | Injection | 100 mgs. |
| 9 | 10/1/81 | Prescribed | 50 mg. tabs #50 |
| 10 | 10/1/81 | Injection | 100 mgs. |
| 11 | 10/1/81 | Injection | 100 mgs. @3:15pm |
| 12 | 11/3/81 | Prescribed | 50 mg. tabs #50 |
| 13 | 11/3/81 | Injection | 100 mgs. |
| 14 | 11/3/81 | Injection | 100 mgs. @5:50pm |
| 15 | 11/17/81 | Injection | 100 mgs. |
| 16 | 11/28/81 | Prescribed | 50 mg. tabs #50 |
| 17 | 12/28/81 | Prescribed | 50 mg. tabs #50 |
| 18 | 12/28/81 | Injection | 100 mgs. |
| 19 | 1/19/82 | Prescribed | 50 mg. tabs #50 |
| 20 | 1/19/82 | Injection | 100 mgs. |
| 21 | 2/17/82 | Prescribed | 50 mg. tabs #50 |
| 22 | 2/17/82 | Injection | 100 mgs. |
| 23 | 3/17/82 | Injection | 100 mgs. |
| 24 | 3/18/82 | Injection | 100 mgs. |
| 25 | 3/18/82 | Prescribed | 50 mg. tabs #5 |
| 26 | 4/15/82 | Injection | 100 mgs. |
| 27 | 4/21/82 | Injection | 100 mgs. |

18.

| | <u>Date</u> | <u>Manner Provided</u> | <u>Amount of Demerol</u> |
|----|-------------|----------------------------|------------------------------|
| 1 | | | |
| 2 | | | |
| 3 | 5/14/82 | Injection | 100. mgs. |
| 4 | 5/14/82 | Prescribed | 50 mg. tabs #50 |
| 5 | 5/21/82 | Injection | 100 mgs. |
| 6 | 5/30/82 | Prescribed | 50 mg. tabs #50 |
| 7 | 6/21/82 | Injection | 100 mgs. |
| 8 | 6/21/82 | Prescribed | 50 mg. tabs #50 |
| 9 | 6/30/82 | Injection | 100 mgs. |
| 10 | 7/1/82 | Injection | 100 mgs. |
| 11 | 7/5/82 | Injection | 100 mgs. |
| 12 | 8/1/82 | Prescribed | 50 mg. tabs #50 |
| 13 | 8/13/82 | Injection | 100 mgs. |
| 14 | 8/17/82 | Injection | 100 mgs. |
| 15 | 8/17/82 | Prescribed | 50 mg. tabs #50 |
| 16 | 9/1/82 | Prescribed | 50 mg. tabs #50 |
| 17 | 9/10/82 | Injection | 100 mgs. |
| 18 | 9/17/82 | Prescribed | 50 mg. tabs #50 |
| 19 | 9/17/82 | Injection | 100 mgs. |
| 20 | 9/21/82 | Injection | 100 mgs. |
| 21 | 10/5/82 | Injection | 100 mgs. |
| 22 | 10/13/82 | Injection | 100 mgs. |
| 23 | 10/19/82 | Injection | 100 mgs. |
| 24 | 10/19/82 | Prescribed | 50 mg. tabs #50 |
| 25 | 10/22/82 | Injection | 100 mgs. |
| 26 | 11/1/82 | Injection | 100 mgs. |
| 27 | 11/1/82 | Prescribed | 50 mg. tabs #50 |

| | <u>Date</u> | <u>Manner Provided</u> | <u>Amount of Demerol</u> |
|----|-------------|----------------------------|------------------------------|
| 1 | | | |
| 2 | | | |
| 3 | 11/3/82 | Injection | 100 mgs. |
| 4 | 11/4/82 | Injection | 75 mgs. |
| 5 | 11/21/82 | Prescribed | 50 mg. tabs #50 |
| 6 | 11/22/82 | Injection | 100 mgs. @10:30am |
| 7 | 11/22/82 | Injection | 100 mgs. @3:30pm |
| 8 | 12/8/82 | Injection | 100 mgs. |
| 9 | 12/16/82 | Injection | 100 mgs. |
| 10 | 12/18/82 | Injection | 100 mgs. |
| 11 | 12/27/82 | Injection | 100 mgs. |
| 12 | 12/28/82 | Injection | 100 mgs. |
| 13 | 1/1/83 | Prescribed | 50 mg. tabs #50 |
| 14 | 1/6/83 | Injection | 100 mgs. |
| 15 | 1/6/83 | Injection | 100 mgs. |
| 16 | 1/24/83 | Injection | 100 mgs. |
| 17 | 1/24/83 | Prescribed | 50 mg. tabs #50 |
| 18 | 2/3/83 | Injection | 100 mgs. |
| 19 | 2/11/83 | Injection | 100 mgs. |
| 20 | 2/14/83 | Injection | 100 mgs. |
| 21 | 2/18/83 | Injection | 100 mgs. |
| 22 | 2/23/83 | Injection | 100 mgs. |
| 23 | 2/23/83 | Prescribed | 50 mg. tabs #50 |
| 24 | 3/3/83 | Injection | 100 mgs. |
| 25 | 3/7/83 | Injection | 100 mgs. |
| 26 | 3/8/83 | Injection | 100 mgs. |
| 27 | 3/22/83 | Injection | 100 mgs. |

20.

| | <u>Date</u> | <u>Manner Provided</u> | <u>Amount of Demerol</u> |
|----|-------------|----------------------------|------------------------------|
| 1 | | | |
| 2 | | | |
| 3 | 3/28/83 | Injection | 100- mgs. |
| 4 | 3/28/83 | Prescribed | 50 mg. tabs #50 |
| 5 | 4/8/83 | Injection | 100 mgs. |
| 6 | 4/12/83 | Injection | 100 mgs. |
| 7 | 4/13/83 | Injection | 100 mgs. |
| 8 | 4/18/83 | Injection | 100 mgs. |
| 9 | 4/21/83 | Injection | 100 mgs. |
| 10 | 4/25/83 | Prescribed | 50 mg. tabs #50 |
| 11 | 4/25/83 | Injection | 100 mgs. |
| 12 | 5/5/83 | Injection | 100 mgs. |
| 13 | 5/12/83 | Injection | 100 mgs. |
| 14 | 5/16/83 | Injection | 100 mgs. |
| 15 | 5/26/83 | Injection | 100 mgs. |
| 16 | 5/31/83 | Injection | 100 mgs. |
| 17 | 5/31/83 | Prescribed | 50 mg. tabs #35 |
| 18 | 6/5/83 | Injection | 100 mgs. |
| 19 | 6/7/83 | Injection | 100 mgs. |
| 20 | 6/9/83 | Injection | 100 mgs. |
| 21 | 6/16/83 | Injection | 100 mgs. |
| 22 | 6/17/83 | Injection | 100 mgs. |
| 23 | 6/23/83 | Injection | 100 mgs. |
| 24 | 6/28/83 | Injection | 100 mgs. |
| 25 | 6/28/83 | Prescribed | 50 mg. tabs #30 |
| 26 | 7/21/83 | Injection | 100 mgs. |
| 27 | 7/25/83 | Injection | 80 mgs. |

21.

| | <u>Date</u> | <u>Manner Provided</u> | <u>Amount of Demerol</u> |
|----|-------------|----------------------------|------------------------------|
| 1 | | | |
| 2 | | | |
| 3 | 7/28/83 | Injection | 60 mgs. |
| 4 | 7/28/83 | Prescribed | 50 mg. tabs #40 |
| 5 | 8/1/83 | Injection | 50 mgs. |
| 6 | 8/5/83 | Injection | .8 cc. |
| 7 | 8/8/83 | Injection | .8 cc. |
| 8 | 8/11/83 | Injection | 80 mgs. |
| 9 | 8/15/83 | Injection | 50 mgs. |
| 10 | 8/25/83 | Injection | 60 mgs. |
| 11 | 8/30/83 | Injection | 70 mgs. |
| 12 | 8/31/83 | Prescribed | 50 mg. tabs #30 |
| 13 | 9/2/83 | Injection | 60 mgs. |
| 14 | 9/8/83 | Injection | 60 mgs. |
| 15 | 9/13/83 | Injection | 60 mgs. |
| 16 | 9/16/83 | Injection | 60 mgs. |
| 17 | 9/22/83 | Injection | 60 mgs. |
| 18 | 9/26/83 | Injection | 50 mgs. |
| 19 | 9/29/83 | Prescribed | 50 mg. tabs #30 |
| 20 | 9/29/83 | Injection | 50 mgs. |
| 21 | 10/6/83 | Injection | 50 mgs. |
| 22 | 10/10/83 | Injection | 50 mgs. |
| 23 | 10/14/83 | Injection | 50 mgs. |
| 24 | 10/17/83 | Injection | 50 mgs. |
| 25 | 10/20/83 | Injection | 50 mgs. |
| 26 | 10/24/83 | Injection | 50 mgs. |
| 27 | 10/28/83 | Injection | 50 mgs. |

22.

| | <u>Date</u> | <u>Manner Provided</u> | <u>Amount of Demerol</u> |
|----|-------------|----------------------------|------------------------------|
| 1 | | | |
| 2 | | | |
| 3 | 10/28/83 | Prescribed | 50 mg. tabs #35 |
| 4 | 10/31/83 | Injection | 50 mgs. |
| 5 | 11/4/83 | Injection | 50 mgs. |
| 6 | 11/7/83 | Injection | 50 mgs. |
| 7 | 11/14/83 | Injection | 50 mgs. |
| 8 | 11/28/83 | Injection | 50 mgs. |
| 9 | 11/29/83 | Injection | 50 mgs. |
| 10 | 11/30/83 | Injection | 50 mgs. |
| 11 | 11/30/83 | Prescribed | 50 mg. tabs #35 |
| 12 | 12/5/83 | Injection | 50 mgs. |
| 13 | 12/8/83 | Injection | 50 mgs. |
| 14 | 12/12/83 | Injection | 50 mgs. |
| 15 | 12/16/83 | Injection | 50 mgs. |
| 16 | 12/19/83 | Injection | 50 mgs. |
| 17 | 12/22/83 | Injection | 50 mgs. |
| 18 | 12/22/83 | Prescribed | 50 mg. tabs #35 |
| 19 | 1/2/84 | Injection | 50 mgs. |
| 20 | 1/6/84 | Injection | 50 mgs. |
| 21 | 1/9/84 | Injection | 50 mgs. |
| 22 | 1/13/84 | Injection | 50 mgs. |
| 23 | 1/16/84 | Injection | 50 mgs. |
| 24 | 1/20/84 | Injection | 50 mgs. |
| 25 | 1/23/84 | Injection | 45 mgs. |
| 26 | 1/27/84 | Injection | 45 mgs. |
| 27 | 1/27/84 | Prescribed | 50 mg. tabs #35 |

23.

| | <u>Date</u> | <u>Manner Provided</u> | <u>Amount of Demerol</u> |
|----|-------------|----------------------------|------------------------------|
| 1 | | | |
| 2 | | | |
| 3 | 1/30/84 | Injection | 45 mgs. |
| 4 | 2/3/84 | Injection | 45 mgs. |
| 5 | 2/6/84 | Injection | 40 mgs. |
| 6 | 2/10/84 | Injection | 40 mgs. |
| 7 | 2/13/84 | Injection | 40 mgs. |
| 8 | 2/17/84 | Injection | 40 mgs. |
| 9 | 2/20/84 | Injection | 40 mgs. |
| 10 | 2/24/84 | Injection | 40 mgs. |
| 11 | 2/27/84 | Injection | 40 mgs. |
| 12 | 2/29/84 | Prescribed | 50 mg. tabs #30 |
| 13 | 3/5/84 | Injection | 40 mgs. |
| 14 | 3/12/84 | Injection | 35 mgs. |
| 15 | 3/16/84 | Injection | 35 mgs. |
| 16 | 3/19/84 | Injection | 35 mgs. |
| 17 | 3/26/84 | Injection | 30 mgs. |
| 18 | 3/30/84 | Injection | 30 mgs. |
| 19 | 4/1/84 | Prescribed | 50 mg. tabs #30 |
| 20 | 4/2/84 | Injection | 30 mgs. |
| 21 | 4/9/84 | Injection | 30 mgs. |
| 22 | 4/13/84 | Injection | 30 mgs. |
| 23 | 4/13/84 | Injection | 30 mgs. |
| 24 | 4/23/84 | Injection | 30 mgs. |
| 25 | 4/27/84 | Injection | 30 mgs. |
| 26 | 4/30/84 | Injection | 30 mgs. |
| 27 | 5/1/84 | Prescribed | 50 mg. tabs #30 |

| | <u>Date</u> | <u>Manner Provided</u> | <u>Amount of Demerol</u> |
|----|-------------|------------------------|--------------------------|
| 1 | | | |
| 2 | | | |
| 3 | 5/7/84 | Injection | 30 mgs. |
| 4 | 5/11/84 | Injection | 40 mgs. |
| 5 | 5/14/84 | Injection | 30 mgs. |
| 6 | 5/18/84 | Injection | 30 mgs. |
| 7 | 5/21/84 | Injection | 25 mgs. |
| 8 | 5/31/84 | Prescribed | 50 mg. tabs #30 |
| 9 | 6/4/84 | Injection | 25 mgs. |
| 10 | 6/8/84 | Injection | 25 mgs. |
| 11 | 6/11/84 | Injection | 25 mgs. |
| 12 | 6/15/84 | Injection | 25 mgs. |
| 13 | 6/18/84 | Injection | 25 mgs. |
| 14 | 6/22/84 | Injection | 30 mgs. |
| 15 | 6/25/84 | Injection | 25 mgs. |
| 16 | 6/29/84 | Injection | 25 mgs. |
| 17 | 6/30/84 | Prescribed | 50 mg. tabs #20 |
| 18 | 7/2/84 | Injection | 25 mgs. |
| 19 | 7/6/84 | Injection | 25 mgs. |
| 20 | 7/9/84 | Injection | 25 mgs.. |
| 21 | 7/30/84 | Prescribed | 50 mg. tabs #25 |

22 B. Respondent violated Section 2242(a) in that in
 23 numerous instances as described in Paragraph XV.A. he prescribed
 24 Demerol, a Schedule II dangerous drug, for Patient D.I. without
 25 a good faith prior examination and medical indication therefor.

26 C. Respondent violated Section 725 of the Code in
 27 that the prescribing of Demerol for D.I. as set forth in

1 Paragraph XV.A. constitutes repeated acts of clearly excessive
2 prescribing as determined by the standard of the local community
3 of licensees.

4 D. Respondent violated Section 2238 of the Code in
5 that on numerous occasions he failed to make or maintain records
6 as required by Section 11190 of the Health and Safety Code of all
7 the Schedule II controlled substances prescribed, dispensed and/or
8 administered to patient D.I. as set forth above in Paragraph
9 XV.A. or to note the pathology and purpose for which the
10 prescriptions were issued, administered or dispensed.

11 E. Respondent violated Section 2241 in that he contin-
12 ued to prescribe, furnish and administer Demerol, a Schedule II
13 controlled substance and dangerous drug for D.I. when respondent
14 knew or should have known that said patient was an addict or
15 habitue.

16 F. Respondent is guilty of gross negligence in the
17 treatment of D.I. in violation of Section 2234(b) in that despite
18 repeated indications that D.I. had become addicted to Demerol and
19 was a drug abuser, respondent repeatedly prescribed, furnished and
20 administered Demerol, a Schedule II controlled drug, for D.I.
21 without any examination, medical indication or documentation for
22 the need for the drug, failed to make any follow-up as to the
23 side effects of the substance on the patient, and failed to
24 attempt treating the patient with alternative non-addictive
25 substances.

26 G. Respondent is guilty of repeated negligent acts in
27 violation of Section 2234(c) in that the acts or omissions

1 described above in Paragraphs XV.A-F were repeated numerous times
2 over a period of eight years as described in Paragraph XV.A.
3 above.

4 XVI.

5 Respondent is further subject to discipline pursuant
6 to Section 2234 for unprofessional conduct within the meaning of
7 Section 2234(c), as more particularly alleged:

8 A. Paragraphs XI.A., XII.A., XIII.A., XIV.A., and
9 XV.A. hereinabove are incorporated herein by reference as though
10 fully set forth.

11 B. Respondent's frequent and repeated prescribing,
12 furnishing or administering since 1976 of the types and quantities
13 of Schedule II controlled substances and dangerous drugs set forth
14 above without a good faith prior examination and medical indica-
15 tion therefor constitutes repeated similar negligent acts.

16 WHEREFORE, complainant prays that the Board hold a
17 hearing on the matters alleged herein, and following a hearing
18 issue a decision:

19 1. Revoking or suspending Certificate No. G-26168
20 issued to John Witter Bradshaw, M.D.

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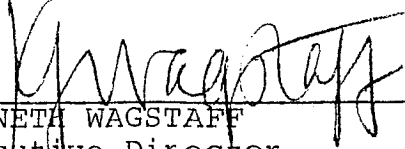
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1 2. Taking such other and further action as the Board
2 deems necessary and proper.

3 DATED: May 29, 1985

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5
6 
7 KENNETH WAGSTAFF
8 Executive Director
9 Board of Medical Quality Assurance
10 Department of Consumer Affairs
11 State of California

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16 Complainant
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